

---

<b>Jahmir Adams, Jeremy Lee Hensel,</b>	<b>: United States District Court</b>
<b>Danny Jesus Ruiz, Antonio McGruther,</b>	<b>: Eastern District of Pennsylvania</b>
<b>Tray Daniels, Shawn Schlopy, Miguel Martell,</b>	<b>:</b>
<b>and Copeland Tyler Plaintiffs,</b>	<b>: Civil Division – Civil Rights</b>
<b>vs.</b>	<b>: Class Action – JURY DEMAND</b>
<b>Adelphoi USA, John/Jane Does 1-100, Defendants.</b>	<b>: Case No.: 23-cv-3684</b>

---

**PLAINTIFFS’ REQUEST FOR A TIME EXTENSION TO FILE AN AMENDED  
COMPLAINT**

AND NOW, comes the Plaintiffs, via their attorney, David Wesley Cornish, Esquire, who respectfully represents the following:

1. The Defense filed a Motion to Dismiss on or about November 24, 2023;
2. A responsive filing within 14 days of notice;
3. Plaintiffs’ Counsel is requesting an extension until January 8, 2024;
4. Plaintiffs intend to use this extension to file a First Amended Complaint to cure the deficiencies and issues raised in the Defendant’s Motion to Dismiss;
5. This delay will in no way prejudice opposing counsel or the Defendants.

**WHEREFORE**, Appellant respectfully requests this Honorable Court grant him an extension.

Respectfully Submitted,



---

/S/ David Wesley Cornish, Esquire  
David Wesley Cornish, Esquire  
Bar ID #: 310865  
230 South Broad Street, 17<sup>th</sup> Floor  
Philadelphia, PA 19102  
**ATTORNEY FOR PLAINTIFF**  
Date: December 4, 2023

**CERTIFICATE OF COMPLIANCE**

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Cornerstone Legal Group, LLC

Name: David Wesley Cornish, Esquire

Attorney No.: 310865



---

**Date:** December 4, 2023

**VERIFICATION**

The facts set forth in the foregoing Motion are true and correct to the best of the undersigned's knowledge, information and belief and are verified subject to the penalties for unsworn falsification to authorities and perjury pursuant to state and United States law.

Submitted by: Cornerstone Legal Group, LLC

Name: David Wesley Cornish, Esquire

Attorney No.: 310865



---

**Date:** December 4, 2023

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that this \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ a true and correct copy of the foregoing *Complaint* has been served via electronic/mail upon the following:

**Frank Deasay, Esq. and Matthew Junk, Esq.**

Deasey, Mahoney, and Valentini

1601 Market Street, Suite 3400 Philadelphia, PA 191037

Respectfully Submitted,



---

/S/ David Wesley Cornish, Esquire

David Wesley Cornish, Esquire

Bar ID #: 310865

230 South Broad Street, 17<sup>th</sup> Floor

Philadelphia, PA 19102

**ATTORNEY FOR PLAINTIFF**

Date: December 4, 2023